

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT COURT OF PENNSYLVANIA**

In re: : Chapter 13
Terrence Brooker :
Debtor(s) : Bankruptcy No. 14-12878 AMC

RESPONSE

Debtor objects to the Motion for relief filed by Deutsche Bank. In support of Debtor's Response, Debtor avers as follows:

1. Debtor filed this petition on April 11, 2014 and said case was confirmed on January 15, 2015.
2. Debtor is current on his Chapter 13 Trustee payments.
3. Debtor adamantly objects to the mortgagee's motion as he believes he is current on his payments to the mortgage company.
4. Counsel has made three requests to counsel for the mortgagee requesting a payment history which he based his motion on and has not received a response regarding same. is currently working on a loan modification with the mortgagee.
5. Debtor had issues with the mortgagee in the past and contends that he is current on his payments and demands strict proof to the contrary from the moving party.
6. Debtor also does not waive the stay provided by Bankruptcy Rule 4001(a)(3).
7. Debtor further contends that Rule 3002.1 is applicable in the present case and demands strict proof to the contrary on why it shouldn't apply in the present case.

Respectfully submitted,

/s/ Mitchell Lee Chambers, Esq.
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